

REMARKS

Claims 1-8, 10, 12-21, 23-25 and 27-34 are pending in the present application. By this Response claim 11 is canceled. Reconsideration of the claims is respectfully requested.

I. Application to be Considered Special

This application has received a third non-final Office Action. As per MPEP § 707.02, Applicants respectfully request that the Supervisory Patent Examiner personally check on the pendency of this application and make every effort to terminate prosecution.

II. 35 U.S.C. § 102, Alleged Anticipation, Claims 1-5, 8, 11-18, 21, 24, 25, and 27-34

The Office Action rejects claims 1-5, 8, 11-18, 21, 24, 25, and 27-34 under 35 U.S.C. § 102(e) as being allegedly anticipated by Beckwith et al. (U.S. Patent No. 6,330,598 B1). This rejection is respectfully traversed.

As to claims 1, 8, 11, 12, 13, 14, 21, 24, and 25, the Office Action states:

Beckwith is directed to the global management of an intelligent network, which thus comprises a distributed data processing system including a network, a plurality of clients connected to the network, and servers connected to the network [FIG 1].

As to claim 11, Beckwith allows users to submit requests that can specify or modify stored information in the form of parameters for a subscribed-to service including deletion of a portion of the service from some area codes [COL 3 lines 29-40]. The user may communicate with a browser and thus via Web pages [FIG 1]. Such an update corresponds to discarding a portion of the stored information.

Beckwith teaches the claimed invention at another level as well, whereby a user can withdraw an update request message before it is applied, in which case it is deleted [COL 5 lines 10-22].

As to claim 1, executing an update request is clearly a (business) transaction, and a cancellation of it corresponds to selecting information that is no longer required for the transaction. Alternately, any update that removes information from a service at the request of a user corresponds to

removal of a portion of the service information. These transactions are treated in more detail in FIG 5B-8B and associated discussions.

Office Action dated January 19, 2005, pages 2-3.

Claim 1, which is representative of the other rejected independent claims 12, 14, and 24 with regard to similarly recited subject matter, reads as follows:

1. A method in a data processing system for managing information, the method comprising:
 - receiving information from a plurality of users;
 - storing the information to form stored information;
 - receiving a request to remove selected information from the stored information from a user within the set of users, wherein the selected information is received in response to a transaction involving the user;
 - responsive to receiving the request, determining if the selected information is no longer required for the transaction; and
 - responsive to the selected information no longer being required for the transaction, removing the selected non-required information from the stored information.

A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed Cir. 1990). All limitations of the claimed invention must be considered when determining patentability. *In re Lowry*, 32 F.3d 1579, 1582, 21 U.S.P.Q.2d 1031, 1034 (Fed Cir. 1994). Anticipation focuses on whether a claim reads on the product or process a prior art reference discloses, not on what the reference broadly teaches. *Kalman v. Kimberly-Clark Corp.*, 713 F.2d 760, 218 U.S.P.Q. 781 (Fed. Cir. 1983). Applicants respectfully submit that Beckwith does not teach every element of the claimed invention arranged as they are in the claims. Specifically, Beckwith does not teach determining if the selected information is no longer required for the transaction in response to receiving a request to remove selected information, and removing the selected non-required information from the stored information in response to the selected information no longer being required for the transaction.

Beckwith is directed to a global service management system (GSMS) for use in an advanced intelligent network. The GSMS is adapted to communicate with two or more network element managers servicing Signal Control Points (SCPs) and operating

pursuant to different protocols. Upon receiving an update request message, the GSMS identifies the destination of the message, translates the message into the protocol used at the destination as needed, and routes the translated message to the identified destination.

There is nothing in any section of Beckwith that teaches determining if the selected information is no longer required for the transaction in response to receiving a request to remove selected information. The Office Action relies on the user withdrawing an update request as described by Beckwith as teaching these features. This process is described in column 5, lines 10-22 which reads as follows:

As shown in FIG. 2, if a user withdraws an update request message before it is applied to the SCP 12, 14, the message is deleted by the core system 32 (block 52). This deletion can occur before (flowline 54) or after (flowline 56) the message is scheduled (block 44). As also shown in FIG. 2, in some instances, data is deleted after it has been applied to the SCP databases 16, 18 (flowline 58). Such deletions can occur for a large variety of reasons including, by way of example, not limitation, cancellation of a subscription, and cancellation of a service. Such deletions can be initiated through the global service management system 10 via an update request message.

In this section, the user merely withdraws an update request message before it is applied to the service control point. Thus, the user decides that the update, which the user is performing, is not required and cancels the update. Beckwith does not teach a system that determines if the selected information is no longer required for the transaction in response to receiving a request to remove selected information. In fact, since the user cancels the request before it is applied, the request is never actually received for processing by the Beckwith system. Beckwith merely allows a user to cancel a request before it is applied.

Additionally, Beckwith does not remove the selected non-required information from the stored information in response to the selected information no longer being required for the transaction. As shown above, the update request submitted by the user is never applied to the SCP, thus, the update is never stored. Beckwith merely cancels the request before it is applied. There is no determination made as to whether the selected information from the stored information is required for the transaction by the Beckwith system. Thus, Beckwith does not remove only the selected non-required information but cancels an update request before it is applied.

Claims 8, 13, 21, and 25 recite similar subject matter to that of claims 1, 12, 14, and 24. That is, claims 8, 13, 21, and 25 recite "determining that the stored information is unnecessary to the business transaction in response to receiving the request, and removing the stored information in response to the stored information no longer being necessary to the business transaction." As discussed above, Beckwith merely cancels a user update request before it is applied. Beckwith does not determine if the stored information is unnecessary to a business transaction nor does Beckwith remove the stored information in response to the stored information no longer being necessary to the business transaction. Thus, Beckwith does not teach the specific features as they are arranged in the presently claimed invention.

Thus, Beckwith does not teach each and every feature of independent claims 1, 8, 12-14, 21, 24, and 25 as is required under 35 U.S.C. § 102. At least by virtue of their dependency on independent claims 1, 8, 14, and 21, the specific features of dependent claims 2-5, 15-18, and 27-34 are not taught by Beckwith. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 1-5, 8, 12-18, 21, 24, 25, and 27-34 under 35 U.S.C. § 102.

Furthermore, Beckwith does not teach, suggest or give any incentive to make the needed changes to reach the presently claimed invention. Absent the Examiner pointing out some teaching or incentive to implement Beckwith such that a determination is made as to whether the selected information is no longer required for the transaction and the selected non-required information is removed from the stored information in response to the selected information no longer being required for the transaction, one of ordinary skill in the art would not be led to modify Beckwith to reach the present invention when the reference is examined as a whole. Absent some teaching, suggestion or incentive to modify Beckwith in this manner, the presently claimed invention can be reached only through an improper use of hindsight using the Applicants' disclosure as a template to make the necessary changes to reach the claimed invention.

Moreover, in addition to their dependency from independent claims 1, 8, 14, and 21 respectively, the specific features recited in dependent claims 2-5, 15-18, and 27-34 are not taught by Beckwith. For example, with regard to claims 2 and 15, Beckwith does not teach determining whether the request is a valid request, and preventing removing of

the selected information in response to a determination that the request is an invalid request. The Office Action alleges that Beckwith teaches this feature at column 4, line 51 to column 5, line 21, which reads as follows:

When the scheduled time arrives, the core system 32 delivers the processed update request message to the appropriate translator(s) 36, 38. The translator(s) 36, 38 translate the processed update request message and deliver it to their respective network element manager 20,22 (block 46). The network element manager(s) 20, 22 then process the translated update request message pursuant to their vendor specific protocols. In the event a translated message is defective in some manner (for example, not all required information was originally entered at block 42), the element manager(s) 20,22 send an error message to the global service management system 10 (block 48). The error message(s) from the element manager(s) are translated into a standard format by the interfacing translators 36, 38. The global service management system 10 then notifies the user of the error either automatically (e.g., over the internet, via pre-recorded message over the telephone) or manually (e.g., via a call from provisioning personnel). The error notification method utilized may optionally be the same as the input method used by the user at block 40.

Regardless of the error notification method utilized, if the user modifies its update request message, the process begins again at block 42.

If the element manager 20, 22 does not error the translated request message, it applies the update request message to its corresponding SCP 12, 14 (block 50) thereby updating the SCP database 16, 18 as needed.

As shown in FIG. 2, if a user withdraws an update request message before it is applied to the SCP 12, 14, the message is deleted by the core system 32 (block 52). This deletion can occur before (flowline 54) or after (flowline 56) the message is scheduled (block 44). As also shown in FIG. 2, in some instances, data is deleted after it has been applied to the SCP databases 16, 18 (flowline 58). Such deletions can occur for a large variety of reasons including, by way of example, not limitation, cancellation of a subscription, and cancellation of a service. Such deletions can be initiated through the global service management system 10 via an update request message.

In this section, Beckwith merely describes sending an error message to the user if the translated message is defective. The example of a defective message is described by Beckwith as missing information within the request. Beckwith fails to teach determining if a request to remove selected information from stored information is valid. At best, Beckwith is merely ensuring all of the information is filled in and does not validate whether or not the request is from the actual user. Furthermore, Beckwith does not

prevent the selected information from being removed. Beckwith merely sends an error to the user and lets the user resubmit the request.

With regard to claims 3 and 16, Beckwith does not teach wherein at least one of a certificate, a password, and a key is used to determine whether the request is valid. The Office Action alleges that this feature is taught at column 16, lines 9-21, which reads as follows:

Once created, the client adapter object 80 first determines whether the user is authorized to contact the system 10 (block 503). This is preferably accomplished by comparing a name and pass code or shared secret or digital certificate entered by the user to a security database which may optionally be included in the system database 83. If the user is not a valid user (block 503), the client adapter object 80 sends an error message to the user via the input device in question (block 505), and records the attempt in a database (block 507) to facilitate detection of repeated denied attempts to access the system 10 and possible fraudulent activities.

In this section, Beckwith is merely validating that the user may access the system. Beckwith does not use a certificate, a password, and a key is used to determine whether the request is valid. Merely validating whether a user has access to the system does not obviate the system validating whether a request submitted by a user to remove selected information from stored information is valid.

Thus, in addition to being dependent on independent claims 1, 8, 14, and 21, the specific features of dependent claims 2-5, 15-18, and 27-34 are also distinguishable over Beckwith by virtue of the specific features recited in these claims. Accordingly, Applicants respectfully request withdrawal of the rejection of dependent claims 2-5, 15-18, and 27-34 under 35 U.S.C. § 102.

III. 35 U.S.C. § 103, Alleged Obviousness, Claims 6, 7, 10, 19, 20 and 23

The Office Action rejects claims 6, 7, 10, 19, 20 and 23 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Beckwith et al. (U.S. Patent No. 6,330,598 B1). This rejection is respectfully traversed.

Applicants respectfully traverses the Official Notice presented in the Office Action. While the elements described in the Office Action may be well known at the

time of the invention, Applicants respectfully submit that it would not have been obvious to combine these well known elements with the teachings of Beckwith. That is, Beckwith does not teach or suggest determining if the selected information is no longer required for the transaction in response to receiving a request to remove selected information, and removing the selected non-required information from the stored information in response to the selected information no longer being required for the transaction.

Furthermore, there is not so much as a suggestion in the Beckwith reference to modify the reference to include such features. That is, there is no teaching or suggestion in Beckwith that a problem exists for which credit cards and applets, are a solution. To the contrary, Beckwith only teaches the cancellation of a user's update request before it is applied. Beckwith does not recognize a need to determine if the selected information is no longer required for the transaction in response to receiving a request to remove selected information, and removing the selected non-required information from the stored information in response to the selected information no longer being required for the transaction, or similar subject matter, as recited in claims 1, 8, 12-14, 21, 24, and 25.

Moreover, neither Beckwith nor the Official Notice teaches or suggests the desirability of incorporating the subject matter of the other reference. That is, there is no motivation offered in either reference for the alleged combination. The Office Action alleges that the motivation for the combination is "because failure to do so would cause undue limitations in the applications of a system intended to be." The Beckwith reference does not determine if the selected information is no longer required for the transaction in response to receiving a request to remove selected information, and remove the selected non-required information from the stored information in response to the selected information no longer being required for the transaction. Thus, the only teaching or suggestion to even attempt the alleged combination is based on a prior knowledge of Applicants' claimed invention thereby constituting impermissible hindsight reconstruction using Applicants' own disclosure as a guide.

One of ordinary skill in the art, being presented only with Beckwith and the Official Notice, and without having a prior knowledge of Applicants' claimed invention, would not have found it obvious to combine and modify Beckwith and Official Notice to

arrive at Applicants' claimed invention. To the contrary, even if one were somehow motivated to combine Beckwith and Official Notice, and it were somehow possible to combine the two systems, the result would not be the invention, as recited in claims 1, 8, 12-14, 21, 24, and 25. The result would be removing an entire user environment using a well known element.

Thus, Beckwith along with the Official Notice, taken alone or in combination, fail to teach or suggest all of the features in independent claims 1, 8, 12-14, 21, 24, and 25. At least by virtue of their dependency on claims 1, 8, 14 and 21, the specific features of claims 6, 7, 10, 19, 20, and 23 are not taught or suggested by Beckwith along with the Official Notice, either alone or in combination. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 6, 7, 10, 19, 20, and 23 under 35 U.S.C. § 103.

IV. Conclusion

It is respectfully urged that the subject application is patentable over the prior art of record and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

Respectfully submitted,

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